

ALVERSON TAYLOR & SANDERS
KURT BONDS, ESQ.
Nevada Bar No. 6228
TREVOR WAITE ESQ.
Nevada Bar No. 13779
6605 Grand Montecito Pkwy., Suite 200,
Las Vegas, Nevada 89149
T: (702) 384-7000
F: (702) 385-7000
efile@alversontaylor.com
Attorneys for Defendant,
UNIVERSAL ACCOUNT SERVICING, LLC,

LAW OFFICES OF NICHOLAS M. WAJDA
NICHOLAS M. WAJDA, ESQ.
Nevada Bar No. 11480
871 Coronado Center Drive, Suite 200
Henderson, Nevada 89052
T: (702) 900-6339
F: (866)286-8433
nick@recoverylawgroup.com
Attorney for Plaintiff,
TRAVIS BRINGLE,

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TRAVIS BRINGLE,

Plaintiff,

v.

UNIVERSAL ACCOUNT SERVICING, LLC,

Defendant.

Case No. 2:20-cv-00363-GMN-DJA

**STIPULATION TO EXTEND THE
JOINT PRE-TRIAL ORDER DUE
DATE PURSUANT TO LOCAL RULE
26-3**

**(FIRST REQUEST FOR EXTENSION
OF THE JOINT PRE-TRIAL ORDER
DUE DATE)**

IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiff TRAVIS BRINGLE
("Plaintiff") and Defendant UNIVERSAL ACCOUNT SERVICING, LLC, ("Defendant"), and
through their respective counsel, as follows:

WHEREAS, the Complaint which is the subject of this action was served on Defendant
on March 16, 2020;

WHEREAS, the Defendant filed an Answer to Plaintiff's Complaint on April 27, 2020.

1 WHEREAS, the Court granted the Parties' Discovery Plan and Scheduling Order on June
2 19, 2020.

3 WHEREAS, the Plaintiff served Written Discovery on Defendant on October 7, 2020.

4 WHEREAS, the Defendant served responses to Plaintiff's Written Discovery on
5 December 8, 2020.

6 WHEREAS, the Defendant served Written Discovery on Plaintiff on January 11, 2021.

7 WHEREAS, the Defendant informally produced additional documents to Plaintiff on
8 January 27, 2021.

9 WHEREAS, the Plaintiff served responses to Defendant's Written Discovery on
10 February 16, 2021.

11 WHEREAS, the Plaintiff served a Deposition Notice for the deposition of Defendant's
12 corporate representative.

13 WHEREAS, the Defendant served a Deposition Notice for the deposition of Plaintiff.

14 WHEREAS, the Parties have met and conferred regarding potential resolution and the
15 Joint Pre-Trial Order. The Parties believe, based on recent communications, that there are good
16 prospects for potential resolution of this matter. The parties have met and conferred during
17 recent communications regarding potential resolution and have had good faith discussions. A
18 continuance of the June 16, 2021 Pre-Trial Order due date would allow the Parties the
19 opportunity to attempt to resolve the case without the need for a hearing and without having to
20 incur substantial additional fees and costs related to the Pre-Trial Report. If the Parties are able
21 to reach a resolution, the requested continuance would also preserve judicial resources.

22 WHEREAS, due to the COVID-19 pandemic key personnel from Defendant counsel's
23 office and Defendant's clients have been absent and are working remotely and have been
24 unavailable at various times to assist in discovery matters.

25 WHEREAS, this request is not made for any improper purpose or delay, but rather to
26 accommodate amicable potential resolution of the case.

27 WHEREAS, no party will suffer any prejudice as a result of the extension of time;
28

1 WHEREFORE, the Parties stipulate and agree that good cause exists and request that the
2 court agree that the following dates be extended: the Joint Pre-Trial due date from June 16, 2021
3 to July 23, 2021.

4
5 **IT IS SO STIPULATED.**

6
7 **LAW OFFICE OF NICHOLAS M. WAJDA**

8 Dated: June 16, 2021

s/Nicholas M. Wajda
Nicholas M. Wajda
Attorney for Plaintiff,
TRAVIS BRINGLE

9
10
11
12 **ALVERSON TAYLOR & SANDERS**

13 Dated: June 16, 2021

s/Trevor Waite
Kurt R. Bonds
Trevor Waite
Attorney for Defendant,
UNIVERSAL ACCOUNT SERVICING, LLC.

14
15
16
17
18
19
20
21
22 IT IS SO ORDERED:

23
24 
25 _____
DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

26
27 DATED: June 17, 2021
28 _____

ATTESTATION AND CERTIFICATE OF SERVICE

I, Trevor Waite, am the ECF user whose identification and password are being used to file the Stipulation to Extend the Joint Pre-Trial Order due date. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all counsel whose electronic signatures in the Stipulation to Extend the Joint Pre-Trial due date provided their authority and concurrence to file that document.

ALVERSON TAYLOR & SANDERS

/s/ Trevor Waite
Kurt R. Bonds
Attorney for Defendant,
UNIVERSAL ACCOUNT SERVICING, LLC.